

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

)
C.S. by her Next Friend, ADAM STROUB,)Case No.: 4:22-cv-10993-TGB-EAS
)
Plaintiff,) HON. TERRENCE G. BERG
v)
)
CRAIG MCCRUMB, Individually and in his)
official capacity as Superintendent of Durand)
Area Schools and AMY LEFFEL,)
Individually and in her official capacity as)
Principal of Robert Kerr Elementary School)
And MICHAEL PAPANEK Individually)
and in his official capacity as On Track)
Coach of Robert Kerr Elementary School,)
)
Defendants.)
)

**STIPULATION AND PROPOSED ORDER TO AMEND CASE
MANAGEMENT ORDER**

NOW COME the above-named parties, by and through their respective attorneys and for their Stipulation and Proposed Order to Amend Case Management Order submit the following:

1. That the parties have been working diligently to complete discovery.
2. That, to date, the parties have exchanged written discovery, and completed the depositions of the Plaintiff, her next friend, and the named Defendants.
3. That in light of the foregoing witness's testimony, it was discovered that Jessica Linfield, may have pertinent information concerning the allegations of the Complaint.
4. That it was further discovered that Defendant, Amy Leffel, is no longer the principal for Robert Kerr Elementary where the events giving rise to the Complaint occurred.
5. That in order to complete the necessary pre-trial preparations, Defendants have requested the deposition of Jessica Linfield.
6. That, in addition, the Plaintiff has requested the deposition of now acting Principal of Robert Kerr Elementary, Tonya Klont, to otherwise make any necessary filings and preserve any argument pursuant to F.R.C.P. 25(d).
7. That this Honorable Court's Case Management Order has set Discovery to conclude on December 22, 2022.

8. That despite the parties' best efforts, they do not believe that they will be able to complete the foregoing depositions and remaining discovery matters within the present Discovery deadline and remaining dates set forth in the Case Management Order.

Therefore, the parties stipulate and request this Court amend the upcoming deadlines in this case as follows:

1. That Discovery be adjourned from December 22, 2022, until February 28, 2023;
2. That the date for filing of dispositive motions be adjourned from February 22, 2023 until April 22, 2023;
3. That the dates for the Final Pretrial Conference and Trial Date be adjourned consistent with the new proposed deadlines stated above;
4. That counsel for the parties believe that good cause exists relating to their first joint request for an extension of the Scheduling Order based on the circumstances set forth above.

Dated: December 14, 2022

/s/ JOHN R. MONROE
John Robert Monroe
Attorney for Plaintiff

Dated: December 14, 2022

/s/DANIEL J. LoBELLO
Daniel J. LoBello (P81069)
Gregory W. Mair (P67465)
Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

)
C.S. by her Next Friend, ADAM STROUB,)Case No.: 4:22-cv-10993-TGB-EAS
)
Plaintiff,) HON. TERRENCE G. BERG
v)
)
CRAIG MCCRUMB, Individually and in his)
official capacity as Superintendent of Durand)
Area Schools and AMY LEFFEL,)
Individually and in her official capacity as)
Principal of Robert Kerr Elementary School)
And MICHAEL PAPANEK Individually)
and in his official capacity as On Track)
Coach of Robert Kerr Elementary School,)
)
Defendants.)

)

ORDER

Upon reading and filing the hereinabove Stipulation to Amend Case Management Order and the Court being fully advised in the premises;

IT IS HEREBY ORDERED AND ADJUDGED that the Case Management Order be Amended as follows:

1. That Discovery be extended until February 28, 2023;
2. That the date for filing of dispositive motions is adjourned from February 22, 2023 to April 22, 2023;

3. That the date for the Final pretrial conference will be set after ruling on dispositive motions;
4. That the date for Trial will be set after ruling on dispositive motions.

/S/Terrence G. Berg
Hon. Terrence G. Berg
UNITED STATES DISTRICT JUDGE

Dated: December 19, 2022

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing paper with the Clerk of the Court using ECF system which will send confirmation of such filing to the following:

Daniel J. LoBello dan@owdpc.com

Gregory W. Mair gmair@owdpc.com
jmconnolly@owdpc.com
sheryl@owdpc.com
dmclure@owdpc.com

John R. Monroe jrm@johnmonroelaw.com

Respectfully submitted,

Dated: December 12, 2022 /s/ JOHN R. MONROE

John Robert Monroe
Attorney for Plaintiff
156 Robert Jones Road
Dawsonville, GA 30534
(678) 362-7650
jrm@johnmonroelaw.com

/s/DANIEL J. LoBELLO
Daniel J. LoBello (P81069)
Gregory W. Mair (P67465)
Attorneys for Defendant
300 St. Andrews Rd., Suite 302
Saginaw, Michigan 48638
dan@owdpc.com
greg@owdpc.com